

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHAD STANBRO,

Plaintiff,

Case No. 7:19-cv-10857 (KMK-JCM)

-against-

WESTCHESTER COUNTY HEALTH
CARE CORPORATION, WESTCHESTER
MEDICAL CENTER, FRANK WEBER and
JOHN FULL,

NOTICE OF MOTION

Defendants.

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CHAD STANBRO,

Plaintiff,

Case No. 7:20-cv-01591 (KMK-JCM)

-against-

CORRECTION OFFICER NADYA PALOU,
CORRECTION OFFICER RAYMOND DEAL,
CORRECTION OFFICER KRISTOFER LEONARDO,
CORRECTION OFFICER RICHARD LANDRY,
CORRECTION NURSE GARY PAGLIARO and
CORRECTION SERGEANT ENRIQUE TORRES,

Defendants.

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PLEASE TAKE NOTICE, that plaintiff will move before the United States District Court,
Southern District of New York, 300 Quarropas Street, White Plains, NY 10601, before the Hon.
Magistrate Judge Judith C. McCarthy, at a date and time to be set by the Court, for an order
imposing spoliation sanctions against defendants Nadya Palou, Raymond Deal, Kristofer Leonardo,
Richard Landry, and Enrique Torres, for failure to preserve a videotape of events relevant to these
underlying lawsuits, and that said sanctions be in the form of adverse inferences against said

defendants, together with such other and further relief as is just, proper, and equitable.

Dated: New York, New York

June 1, 2021

Sivin & Miller, LLP

s/ Edward Sivin

Edward Sivin

Attorneys for Plaintiff

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New York State Office of the Attorney General

Attorney for defendants Kristofer Leonardo, Richard Landry, Gary Pagliaro, and Enrique Torres
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